

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR 2023 Annual Report

Introduction

This is the first report by CenterLine (Windsor) Limited (“CenterLine”), business number 100868744, published in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the financial year ended September 30, 2023. This report sets forth the steps CenterLine has taken to mitigate modern slavery in its business and at each step of the production of goods in Canada or of goods imported into Canada by CenterLine.

For the purposes of this report, modern slavery is the exploitation of an individual for personal or commercial gain. It includes, but is not limited to child labour, compulsory or forced labour, debt bondage, human trafficking, servitude, slavery, or acts committed with the intent of any of the foregoing.

Structure, Operations and Supply Chains [11(3)(a)]¹

CenterLine (Windsor) Limited, with corporate headquarters in LaSalle, Ontario, is a privately held Ontario Corporation founded in 1957. At the report date, the four facilities at this location employed 764 individuals to serve customers throughout North America, and more broadly global markets through international distributors and in collaboration with global affiliates operating within Brazil, China, Germany, India, Mexico, Romania, and the United States.

CenterLine is internationally well known for manufacturing a wide spectrum of industrial products for welding, joining, metal working, and assembly. Products for these applications range from stocked consumables to complex turnkey systems involving automation and multiple processes. While CenterLine’s background and principal market is the automotive industry, CenterLine’s cold spray products are globally recognized and employed in aerospace, military, and other advanced applications.

While CenterLine seeks to source raw materials, components, systems, and services from local suppliers, it has an international supply chain. CenterLine values long-term relationships with suppliers that demonstrate similar principles and values, where working collaboratively to leverage knowledge, skills, and products will result in a unique value proposition benefiting both parties. These established relationships minimize the risk that CenterLine’s supply chain includes bad actors with incompatible business ethics.

CenterLine does not directly purchase any raw conflict minerals from any source, and is many levels removed from the mines, smelters, and refiners that produce the metals used in the products distributed or manufactured by CenterLine’s suppliers. It is expected that CenterLine’s suppliers will responsibly source materials and not knowingly provide products containing raw

¹ Ref.: Canada S-211, *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

materials that contribute to human rights abuses, bribery, or ethics violations; violate export controls or economic sanctions; or directly or indirectly support crime or terrorist organizations.

Policies and Due Diligence Process [11(3)(b)]

a) CenterLine Internal Documents

CenterLine has a number of internal documents, such as the **CenterLine Values** booklet, **CenterLine Employee Handbook**, **Human Resource Policies**, and the **CenterLine Brand Integrity Manual**, which express company values and ethical business principles - including those related to human rights issues. CenterLine personnel are aware of their role in ensuring that both the practice and intent of such policies and procedures are followed; and that any concerns or issues are reported.

CenterLine's **Terms and Conditions of Sale** and **Purchase Order Terms and Conditions** also express company expectations and requirements to customers and suppliers respectively. All of these documents are routinely revised as opportunities for improvements are identified.

b) Sustainability Principles

In 2023, work began to prepare the **CenterLine Sustainability Principles** document for public release. This document, published in January 2024, details the ethical business principles and family values identified by the owners and senior management of CenterLine as fundamentally important to the sustainability of the business. The document addresses human rights principles, including CenterLine's role in preventing complicity or acts of collusion concerning violations of fundamental human rights (e.g., forced labour and child labor).

A principal objective of this document to ensure all stakeholders (CenterLine employees, customers, suppliers, and the communities CenterLine operates within) have a clear understanding of their responsibilities in supporting and applying these principles. CenterLine recognizes that its reputation depends on acting with honesty, integrity, and transparency while remaining in compliance with the applicable codes of conduct, laws, and regulations.

The document addresses expectations for its application, an invitation to seek clarification or training, and how to report concerns.

Risk Assessment and Management [11(3)(c)]

CenterLine has no operations and few vendors in high-risk industries and geographies. As a result, formal process of supply chain assessment has not yet been implemented at this stage of CenterLine's Sustainability framework development.

Measures to Prevent and Reduce the Risks of Modern Slavery [11(3)(d)]

No incidents of modern slavery were reported or otherwise identified within CenterLine's operations or supply chains. As such, no remediation measures have been taken to date. CenterLine is committed to implement appropriate remediation measures in the event any association with forced labour or child labour has occurred.

Remediation Measures [11(3)(e)]

While we are aware of income loss remediation expectations, no need for such remediation measures has been identified.

Training [11(3)(f)]

CenterLine has not yet required specific employee training on modern slavery, including forced labour and child labour.

Assessing Effectiveness [11(3)(g)]

CenterLine does not yet have a formal process for measuring effectiveness in the mitigation and prevention of modern slavery. We will continue to review and enhance CenterLine's policies and due diligence processes to mitigate the risk to both vulnerable individuals and CenterLine's business.

Approval and Attestation [11(4)]

This report has been approved by the Executive Committee of CenterLine (Windsor) Limited.

In accordance with the requirements of the Act, and in particular section 11 thereof, I hereby attest that I have reviewed the information contained in this report. Based on my knowledge, and having exercised due diligence, I attest, that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



David Beneteau
President
May 28, 2024

I have the authority to bind CenterLine (Windsor) Limited